

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHLEEN DOUGLAS, an individual,

Plaintiff,

v.

EMPLOYBRIDGE, LLC, a California Limited
Liability Company; EMPLOYMENT
SOLUTIONS MANAGEMENT, INC., a
Georgia corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:18-cv-01215-JLR

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
THE DEADLINE TO DISCLOSE
EXPERT WITNESS TESTIMONY**

Noted For Consideration:
August 28, 2019

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rule 16(b)(5), Defendants and Plaintiff (collectively "the parties") hereby stipulate to and jointly request a thirty-day extension of the deadline to disclose expert witness testimony as required by Rule 26(a)(2), up to and including September 30, 2019. In support of this Motion, the parties state as follows:

1. Pursuant to the Court's November 27, 2018 Order Setting Trial Dates and Related Dates, the current deadline to disclose expert witness testimony is August 28, 2019. Dkt. #8. The parties have not requested an extension of the deadline to disclose expert witnesses previously.

STIPULATED MOTION AND ORDER TO EXTEND
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1 2. The current deadline to complete discovery is October 28, 2019, and the deadline
2 for dispositive motions is November 26, 2019. *See id.*

3 3. The parties have engaged in extensive ESI discovery and the parties agree that
4 they will both benefit from having additional time to review and analyze the documents
5 produced prior to determining the nature and extent of expert testimony required, if any.

6 4. This request is not made for purposes of delay, but rather, for the purpose of
7 allowing the parties time to fully comply with their discovery obligations.

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9 Dated: August 28, 2019
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11

12 s/ Kevin Smith

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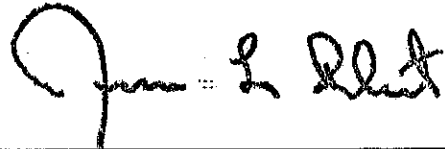
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Attorneys for Defendants
EMPLOYBRIDGE, LLC and
EMPLOYMENT SOLUTIONS
MANAGEMENT, INC.

ORDER

PURSUANT TO THE STIPULATED MOTION FILED BY THE PARTEIS, IT IS SO ORDERED that the deadline to disclose expert witness testimony as required by Rule 26(a)(2) of the Federal Rules of Civil Procedure shall be extended until **September 30, 2019**.

DATED: 28 August 2019



The Honorable James L. Robart
United States District Court Judge